

1 Laurence F. Padway, #89314
2 Law Offices of Laurence F. Padway
3 1516 Oak Street, Suite 109
Alameda, California 94501
Telephone: (510)814-6100
Facsimile : (510)814-0650

4 Attorneys for plaintiff
5 Kip Sides

6
7 UNITED STATES DISTRICT COURT
8 NORTHERN DISTRICT OF CALIFORNIA

9 KIP SIDES,

No. 15-cv-3893 PSG

10
11 Plaintiff,
vs.

**EX PARTE APPLICATION
TO EXTEND INITIAL CASE
MANAGEMENT CONFERENCE
AND ADR DEADLINES**

12 CISCO SYSTEMS INC., and
13 UNITED HEALTHCARE,

14 Defendants.
15 _____ /

16 I, Laurence F. Padway, hereby declare under penalty of perjury that:

17
18 1. I am the attorney for plaintiff.

19
20 2. Plaintiff filed this action on August 26, 2015. The Court's Order of September 15,
21 2015 set the initial case management and ADR deadlines as follows:

22
23 11/3/2015 Last day to:

- 24
25 • meet and confer re: initial disclosures, early
settlement, ADR process selection, and discovery plan
26
27 • file ADR Certification signed by Parties and Counsel
28 • file either Stipulation to ADR Process or Notice of

1 Need for ADR Phone Conference

2 11/17/2015 Last day to:

- 3 • file Rule 26(f) Report, complete initial disclosures or state
4 objection in Rule 26(f) Report and file Case Management Statement
5 per Standing Order re Contents of Joint Case Management Statement

6

7 11/24/2015 Initial Case Management Conference at 10:00 AM

8

9 3. Defendant Cisco Systems Incorporated's answer is due on November 13, 2015.
10 Counsel for plaintiff has spoken with Cisco Systems Incorporated's counsel and understands that
11 they will be seeking additional time to file their answer.

12

13 4. Counsel for plaintiff has also spoken with defendant United Healthcare. They
14 have not yet retained counsel but are currently in settlement negotiations with plaintiff.

15

16 5. Accordingly, plaintiff requests that the deadlines set forth in the Court's September
17 15, 2015 order be extended as follows:

18

19 12/18/2015 Last day to:

- 20 • meet and confer re: initial disclosures, early
21 settlement, ADR process selection, and discovery plan
22 • file ADR Certification signed by Parties and Counsel
23 • file either Stipulation to ADR Process or Notice of

24 Need for ADR Phone Conference

25

26 1/5/2016 Last day to:

- 27 • file Rule 26(f) Report, complete initial disclosures or state
28 objection in Rule 26(f) Report and file Case Management Statement

1 per Standing Order re Contents of Joint Case Management Statement
2

3 1/12/2016 Initial Case Management Conference at 10:00 AM
4

5
6 Executed this 5th day of November, 2015, at Alameda, California.
7

8 /s/ Laurence F. Padway
9 Laurence F. Padway
10
11
12

13 [Proposed] ORDER
14

15 Good cause appearing, the initial case management conference and ADR deadlines
16 are extended as follows:
17

18 12/18/2015 Last day to:
19

- 20 • meet and confer re: initial disclosures, early
settlement, ADR process selection, and discovery plan
- 21 • file ADR Certification signed by Parties and Counsel
- 22 • file either Stipulation to ADR Process or Notice of
Need for ADR Phone Conference

23
24 1/5/2016 Last day to:
25

- 26 • file Rule 26(f) Report, complete initial disclosures or state
objection in Rule 26(f) Report and file Case Management Statement
27 per Standing Order re Contents of Joint Case Management Statement
28

1 1/12/2016 Initial Case Management Conference at 10:00 AM
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28


Honorable Paul Singh Grewal